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Attorney for Defendant
ONSAYO ABRAM

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

United States of America,

Plaintiff,

vs.

JASHUA BAPTISTA and ONSAYO
ABRAM,

Defendants.

) No. CR-10-0050 PJH (LB)
)
) **STIPULATION AND ~~PROPOSED~~**
) **SUPPLEMENTAL ORDER RE:**
) **CONDITIONS OF RELEASE FROM**
) **DETENTION AS TO DEFENDANT**
) **ONSAYO ABRAM**
)
)
) Magistrate Judge Laurel Beeler

1. On January 19, 2010, counsel for Mr. Abram and counsel for the government appeared at a detention hearing before the Honorable Magistrate Judge Laurel Beeler. Pre-Trial Services recommended that Mr. Abram be released on an unsecured surety bond signed by his wife. Ms. Abram appeared, was advised of the surety terms and conditions, and signed as a surety. The government requested that Mr. Abram's parents post the equity in their home in Tolleson, Arizona, as additional security. Mr. Abrams' parents at the time believed that they may have up to \$100,000 in equity in their home; the parties understood, however, that given the current real estate market, the anticipated value may have declined. The Court ordered defense counsel to verify the value of the property and pursue an agreement with the government pursuant to General Order 55, whereby the property would be posted as bond in this matter.

2. Defense counsel and Mr. Abram's parents sought information about the value of the home in Tolleson, Arizona, and provided the same to counsel for the government. Mr. and Mrs.

Abram represented that the current mortgage balance on their home was, in round figures, \$185,000. Using comparable sales provided by a local real estate agent, the current value of the home was estimated to be \$100,000. Unfortunately, therefore, there was no equity in the home to post as security in this case.

3. Mr. and Mrs. Abram own a 2002 Ford Explorer, for which the Kelly Blue Book value is approximately \$6,500. Verification of their ownership, and of the value of the vehicle, has been provided to counsel for the government. Mr. and Mrs. Abram have also executed and provided to the government an Affidavit of Owner of Cash Security setting forth and describing their interest as the equivalent of cash security. The government has agreed to accept the posting of this vehicle as security for Mr. Abram's release, in lieu of the posting of their home.

4. Defense counsel has provided Mr. and Mrs. Abram with the Complaint, Indictment and Penalty Sheet in this case and is informed and believes that they have read and understood the contents of those documents, as well as understanding the conditions imposed on Onsayo Abram and on themselves as sureties, in connection with his release herein. Specifically, defense counsel is informed and believes that Mr. and Mrs. Abram understand that they stand to lose their entire interest in the posted vehicle should Mr. Onsayo Abram fail to appear in court and/or adhere to the other conditions imposed upon him in connection with his release.

SO STIPULATED.

February 18, 2010

_____/S/_____
SUSAN M. RAFFANTI
Attorney for Defendant ONSAYO ABRAM

February 18, 2010

_____/S/_____
CHINHAYI COLEMAN CADET
Assistant United States Attorney

GOOD CAUSE APPEARING, IT IS HEREBY ORDERED that Defendant ONSAYO ABRAM shall remain on Pre-Trial Release on the same terms and conditions as set forth in the

1 Court's orders made on January 19, 2010; and that in lieu of real property being posted as
2 security for his release, title to the 2002 Ford Explorer owned by his parents, Doris and Jerry
3 Abram, shall be posted and transferred to the custody of the Clerk of the Court, as security,
4 according to such procedures as are prescribed by the United States Clerk's Office. Defense
5 counsel is further ordered to obtain from Mr. and Mrs. Abram executed forms AO 100B (Surety
6 Information Sheet) and provide the same to the Court, under seal.

7 SO ORDERED.

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9 Date: February 19, 2010

_____/s/ Laurel Beeler _____

10 LAUREL BEELER

11 United States Magistrate Judge
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